

# EXHIBIT LL

## **Deposition of 30(b)(6) Lilliane Ballesteros**

**Reyes, et al. v. Chilton, et. al.**

**May 19, 2023**



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1 A. Yes.

2 Q. And then the second main bullet says, "It's very  
3 important to establish a relationship with the county  
4 auditor's election officer." Why is it very important  
5 to establish a relationship with the county auditor's  
6 elections office?

7 MR. MORFIN: Objection to form.

8 A. I can't speak fully to the presentation that  
9 happened with this from the staff member and what they  
10 presented and said regarding this. Yeah, I can't speak  
11 fully on what have been presented.

12 Q. (By Ms. Castillo) Does LCF have a relationship  
13 with the Benton County auditor's election office?

14 MR. MORFIN: Objection to form.

15 A. Can you define "relationship"?

16 Q. (By Ms. Castillo) Does LCF work with staff  
17 members of Benton County auditor's elections office?

18 MR. MORFIN: Objection to form.

19 A. I don't fully know.

20 Q. (By Ms. Castillo) Has LCF ever engaged the  
21 Benton County auditor's elections office?

22 MR. MORFIN: Objection to form.

23 A. I guess I'm unfamiliar with what "engage" means.

24 Q. (By Ms. Castillo) Has LCF ever engaged Benton  
25 County auditor's office -- elections office with an

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1 issue of concern?

2 MR. MORFIN: Objection to form.

3 A. I'm not sure.

4 Q. (By Ms. Castillo) Does LCF have a relationship  
5 with the Chelan County auditor's elections office?

6 MR. MORFIN: Objection to form.

7 A. I'm trying to define relationship. We are aware  
8 of the -- the county auditor's offices but do not work  
9 with them on a regular basis.10 Q. (By Ms. Castillo) Has LCF ever reached out to  
11 the Chelan County auditor's elections office to raise an  
12 issue of concern?

13 MR. MORFIN: Objection to form.

14 A. I can't fully say if staff would have.

15 Q. (By Ms. Castillo) And does LCF have a  
16 relationship with the Yakima County auditor's elections  
17 office?

18 MR. MORFIN: Objection to form.

19 A. I guess similar in that we are aware, yeah, are  
20 aware of them.21 Q. (By Ms. Castillo) Has LCF ever reached out to  
22 the Yakima County elections office to raise an issue  
23 that is of concern to LCF?

24 MR. MORFIN: Objection to the form.

25 A. Again, I can't speak to every conversation that

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1 staff would have had completely on that.

2 Q. (By Ms. Castillo) But as you sit here today,  
3 you're not aware of any particular conversation that an  
4 LCF staff may have had with the Yakima County elections  
5 office?

6 MR. MORFIN: Objection to form.

7 A. Not aware of the specific conversation that's  
8 happened.

9 Q. (By Ms. Castillo) Has LCF ever invited any of  
10 the Benton County, Chelan County, or Yakima County  
11 auditor's elections office to participate in one of its  
12 community events?

13 A. Not that I can recall.

14 MS. CASTILLO: So I think it would be a good  
15 time to take a break because I'm going to be turning to  
16 a new topic. So we can go off the record.

17 (A short recess was had.)

18 Q. (By Ms. Castillo) What did LCF -- when did LCF  
19 first become aware of an issue regarding mismatched  
20 signatures by Latino voters?

21 A. In what I know talking with staff, it was in  
22 2015 that we started to hear about this.

23 Q. And what was staff starting to hear about the  
24 signature mismatch issue in 2015?

25 A. At that time, staff were hearing that Latino

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## 1 C E R T I F I C A T E

2 STATE OF WASHINGTON )  
3 )  
4 COUNTY OF YAKIMA )5 This is to certify that I, Dani White, Certified  
6 Court Reporter in and for the State of Washington,  
7 residing at Yakima, reported the within and foregoing  
8 deposition; said deposition being taken before me on the  
9 date herein set forth; that pursuant to RCW 5.28.010 the  
10 witness was first by me duly sworn; that said  
11 examination was taken by me in shorthand and thereafter  
12 under my supervision transcribed; and that same is a  
13 full, true, and correct record of the testimony of said  
14 witness, including all questions, answers, and  
15 objections, if any, of counsel.16 I further certify that I am not a relative or  
17 employee or attorney or counsel of any of the parties,  
18 nor am I financially interested in the outcome of the  
19 cause.20 This transcript and billing has been prepared/  
21 submitted for final preparation and delivery in  
22 accordance with all Washington State laws, court rules,  
23 and regulations.24 Rules regulating formatting and equal terms  
25 requirements have been adhered to. Alterations,  
changes, fees, or charges that violate any of these  
provisions are not authorized by me and are not at my  
direction or with my knowledge.26 IN WITNESS WHEREOF I have set my hand this 2nd  
27 day of June, 2023.

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